

15-0072

CIVIL
CIRCUIT COURT
HANCOCK COUNTY, MISSISSIPPI

Douglas Handshoe

Torstar Corporation
vs.
Peter Edwards

Book _____ Page _____

RETURN THIS FILE TO
KAREN LADNER RUHR
CIRCUIT CLERK
152 MAIN STREET, STE. B
BAY ST. LOUIS, MISSISSIPPI 39520

EXHIBIT

A

IN THE CIRCUIT COURT OF HANCOCK COUNTY MISSISSIPPI

DOUGLAS HANDSHOE

PLAINTIFF

15-0072

VERSUS

CIVIL ACTION NUMBER

TORSTAR CORPORATION (DBA
TORONTO STAR NEWSPAPERS LTD.)
PETER EDWARDS

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: Torstar Corporation
Attn: Marie E. Beyette
One Yonge Street
Toronto, Ontario, Canada
M5E 1E6

Peter Edwards
The Toronto Star
One Yonge Street
Toronto, Ontario, Canada
M5E 1E6

NOTICE TO DEFENDANT(S)

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint to Douglas Handshoe, whose post office address is 214 Corinth Drive, Bay St Louis, MS 39520 and whose street address is 214 Corinth Drive, Bay St Louis, MS 39520. Your response must be mailed or delivered within (30) days from the date of delivery of this summons and complaint or a judgment by default will be entered against you for the money or other things demanded in the complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and the seal of said Court, this 23th day of February, 2015.



PROOF OF SERVICE--SUMMONS
(Process Server)

Torstar Corporation

Name of Person or Entity Served

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used):

____ FIRST CLASS MAIL AND ACKNOWLEDGEMENT SERVICE. By mailing (by first class mail, postage prepaid), on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgement and return envelope, postage prepaid, addressed to the sender (Attach completed acknowledgement of receipt pursuant to M.R.C.P. Form 1B).

____ PERSONAL SERVICE. I personally delivered copies to _____ on the ____ day of _____, 2015, where I found said person in Parish of Jefferson of the State of Louisiana.

____ RESIDENCE SERVICE. After exercising reasonable diligence I was unable to deliver copies to said person within _____ county, (state). I served the summons and complaint on the ____ day of _____, 2015, at the usual place of abode of said person by leaving a true copy of the summons and complaint with who is the _____ (here insert wife, husband, son, daughter or other person as the case may be), a member of the family of the person served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the ____ day of _____, 2015, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

____ CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (Attach signed return receipt or the return envelope marked "Refused.")

At the time of service I was at least 18 years of age and not a party to this action.

Fee for service: \$ _____

Process server must list below: [Please print or type]

Name: _____

Address: _____

Telephone No. _____

State of Mississippi
County of Hancock

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

Process Server Signature

Sworn to and subscribed before me this the _____ day of _____ 2015.

Notary Public

My Commission Expires _____

(Seal)

IN THE CIRCUIT COURT OF HANCOCK COUNTY MISSISSIPPI

DOUGLAS HANDSHOE

PLAINTIFF

15-0072

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The Toronto Star
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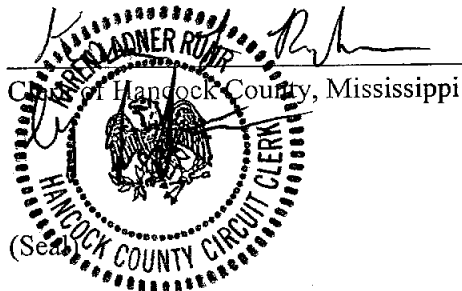
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Issued under my hand and the seal of said Court, this 23th day of February, 2015.



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(Process Server)

Peter Edwards

Name of Person or Entity Served

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State of Mississippi
County of Hancock

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aforesaid, the within named who being first by me duly sworn states on oath that the matters and facts set
forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

Process Server Signature

Sworn to and subscribed before me this the _____ day of _____ 2015.

Notary Public

My Commission Expires _____

(Seal)

FILED

IN THE CIRCUIT COURT OF HANCOCK COUNTY MISSISSIPPI
FEB 23 2015

DOUGLAS HANDSHOE

VERSUS

TORSTAR CORPORATION (DBA
TORONTO STAR NEWSPAPERS LTD.)
PETER EDWARDS

KAREN LADNER RUHR
CIRCUIT CLERK, HANCOCK CO.
BY D.C.

PLAINTIFF

CIVIL ACTION NUMBER

15-0072

DEFENDANTS

CIVIL COMPLAINT FOR DAMAGES

Comes now into the Court your Plaintiff Douglas Handshoe who files this compliant against Torstar Corporation dba Toronto Star Newspapers, Ltd. and Peter Edwards for Defamation and in support states as follows:

I. PARTIES

1. Plaintiff is a Mississippi resident and owner of Slabbed New Media, LLC, which resides in and publishes the investigative weblog located at www.slabbed.org in this Judicial District.
2. Defendant, Torstar Corporation, is a Corporation formed under the laws of Ontario, Canada with registered offices located at Torstar Corporation, One Youge Street, Toronto Ontario, Canada, M5E 1E6.
3. Defendant, Peter Edwards, the author of the publication at issue, is a resident of and domiciled in Toronto, Ontario who can be found at One Youge Street, Toronto Ontario, Canada, M5E 1E6.

II. JURISDICTION AND VENUE

4. Plaintiff's claims arise under Mississippi Law for the Intentional Tort of Defamation.

5. This Court has personal jurisdiction over Defendants because Defendants intentionally caused harm to Plaintiff Handshoe in Mississippi via publication of the defamatory content of a story dated February 24, 2014, including causing damages, which subject the defendant to the jurisdiction and venue of this Honorable Court. Defendant knew or should have known their conduct would subject them to the jurisdiction and venue in this Court by publishing the defamatory content on the internet.
6. Jurisdiction and venue are proper under section 13-3-57 Mississippi Code Annotated (1972) as this is the court of original jurisdiction involving the tort of defamation. It is anticipated that damages will ultimately exceed \$75,000. Plaintiff is seeking punitive damages in addition to actual damages.

III. FACTUAL BACKGROUND

7. Plaintiff has been the victim of an ongoing scheme to cover up a the roles of Trout Point Lodge, Ltd, Vaughn Perret, Daniel Abel and Charles Leary (the Trout Point Group) in a bribery and money scheme masterminded by former Jefferson Parish President Aaron Broussard, who is now incarcerated pursuant to a plea bargain reached with federal prosecutors. Trout Point, Perret and Abel have conducted a campaign of litigation terrorism alleging the tort of defamation against Plaintiff, the Times Picayune and Louisiana Media Company, LLC more commonly known as Fox 8 New Orleans. This campaign of litigation terrorism has included suing four lawyers that have previously represented Plaintiff along with one of their own, Henry Laird. The Trout Point group has collectively sued Plaintiff five times in total including three suits in Canada and two in Louisiana.

8. These lawsuits by the Trout Point Group are designed to harass and defame Plaintiff. The United States District Court has previously conclusively ruled the Trout Point Group's first Canadian lawsuit was so poorly plead it could not have garnered a default in the United States as a matter of law in *Trout Point et al v Handshoe* 729 F. 3d 481.
9. At various times in 2011, in their Canadian defamation action against Louisiana Media Company, the Trout Point Group, in collusion with certain Louisiana businessmen that had participated in the Broussard Nova Scotia bribery scheme, submitted sworn affidavits in support of the defamation action which detailed the business relationship the Trout Point Group had with the Louisiana registered Limited Liability Company Nova Scotia Enterprises, LLC. Slabbed New Media, LLC obtained these affidavits and published them in January and February 2012.
10. On August 31, 2012, the United States Attorney in the case styled USA v Broussard revealed that Nova Scotia Enterprises, LLC was a Broussard bribery scheme.
11. On September 30, 2013, in the very case that is subject to The Toronto Star reporting alleged as defamatory, the Trout Point Group admitted that Nova Scotia Enterprises never owned anything of value in Nova Scotia, confirming real estate abstracts that were first posted to the Slabbed New Media website on September 8, 2011.
12. The affidavits presented in the Trout Point Group's Nova Scotia Louisiana Media defamation suit therefore depicted sham financial transactions with a fictional entity that was never registered to conduct business in Nova Scotia Canada that was later identified by United States Prosecutors as a Broussard bribery scheme.

13. The Torstar Corporation's newspaper, Toronto Star, in an article about these proceedings by Defendant Peter Edwards titled "Nova Scotia couple wins copyright lawsuit against homophobic U.S. blogger", never undertook so much as a cursory investigation of the underlying proceedings in these Canadian court actions, to which the Plaintiff defaulted rather than submit to the jurisdiction of the Canadian courts instead mischaracterizing Plaintiff's reporting as a regurgitation of retracted material from the Times Picayune. This characterization is materially false and misleading.
14. Worse, defendants Torstar Corporation and Peter Edwards additionally and falsely categorized the Plaintiff's reporting on same on February 24, 2014 as a campaign of homophobia and Plaintiff as a "homophobic blogger", a defamatory assertion that is both materially false and was made with reckless disregard for the truth. There has never been such a finding in a court of law in an adversarial proceeding.
15. Canadian courts and newspapers like the Toronto Star have become the last refuge of felonious United States politicians. The publication in question has injured and damaged Plaintiff's reputation in Mississippi.

IV. CAUSE OF ACTION

COUNT 1: DEFAMATION

16. Plaintiff hereby incorporates and realleges all of the allegations in paragraphs 1 through 15 of this petition.
17. By publishing the article to a public website at http://www.thestar.com/news/canada/2014/02/24/nova_scotia_couple_wins_lawsuit_against_homophobic_american_blogger.html Defendants published or caused to be published these false statements to numerous third parties.


18. The article referenced in this complaint was and remain, false, defamatory and libelous and published with reckless disregard for the truth.
19. The article referenced in this complaint contains statements of facts that appear nowhere in the court record that are not subject to privilege.
20. The article referenced in this complaint was and remains of a character that would tend to harm Plaintiff's reputation, lowered his status in the eyes of his community and clientele deterring others from associating and dealing with him and have otherwise exposed him to contempt.
21. As a proximate cause of the defendant's publication of the defamatory statements listed in this complaint Plaintiff has suffered loss to his trade, business and reputation.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

- a. For actual damages according to proof;
- b. For punitive damages according to proof.
- c. For such other and further relief as the Court shall find just and proper.

Submitted this 23th day of February, 2015.



Douglas Handshoe
214 Corinth Drive
Bay St Louis, MS 39520
Phone: (601) 928-5380
earning04@gmail.com

COVER SHEET**Civil Case Filing Form**(To be completed by Attorney/Party
Prior to Filing of Pleading)

Court Identification

Case Year

Docket Number

Docket Number				
23	1	C	I	
County #	Judicial District	Court ID		

2015

0072

02	23	15
Month	Date	Year

Local Docket ID

Mississippi Supreme Court
Administrative Office of CourtsForm AOC/01
(Revised 1/1/2001)

Case Number if filed prior to 1/1/94

This area to be completed by clerk

IN THE CIRCUIT COURT OF HANCOCK COUNTYShort Style of Case: Handshoe v Torstar Corporation DBA Toronto Star Newspapers, LTD and Peter EdwardsParty Filing Initial Pleading: Type/Print Name Douglas Handshoe

MS Bar No. _____

☒ Check ☒ if Not an Attorney ☐ Check ☒ if Pro Hac Vice Signature _____Compensatory Damages Sought: \$ According to proof Punitive Damages Sought: \$ According to ProofIs Child Support contemplated as an issue in this suit? ☐ Yes ☒ No If "yes" is checked, please submit a completed Child Support Information Sheet with Final Decree/Judgment

PLAINTIFF - PARTY(IES) INITIALLY BRINGING SUIT SHOULD BE ENTERED FIRST (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL PLAINTIFFS ON SEPARATE FORM

Individual Handshoe Douglas (_____) K _____
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IVAddress of Plaintiff 214 Corinth Drive, Bay St Louis, MS 39520Check ☒ if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____

Estate of _____

Check ☒ if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____
D/B/A / Agency _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check ☒ if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: _____

D/B/A: _____

DEFENDANT - NAME OF DEFENDANT (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL DEFENDANTS ON SEPARATE FORM

Individual _____ (_____) _____
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IVCheck ☒ if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____

Estate of _____

☒ Check ☒ if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____
D/B/A / Agency Torstar Corporation DBA Toronto Star Newspapers, LTD

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check ☒ if Business Defendant is being sued in the name of an entity other than the above, and enter below: _____

D/B/A: _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar No. _____ or Name: _____ Pro Hac Vice ☒ (If known)

In left hand column, check one (1) box that best describes the nature of this suit. In right hand column check all boxes which indicate secondary claims.

Business/Commercial

- ☐ Accounting (Business)
☐ Bankruptcy
☐ Business Dissolution - Corporation
☐ Business Dissolution - Partnership
☐ Debt Collection
☐ Employment
☐ Examination of Debtor
☐ Execution
☐ Foreign Judgment
☐ Garnishment
☐ Pension
☐ Receivership
☐ Replevin
☐ Stockholder Suit
☐ Other _____

Domestic Relations

- ☐ Child Custody/Visitation
☐ Child Support
☐ Contempt
☐ Divorce: Fault
☐ Divorce: Irreconcilable Differences
☐ Domestic Abuse
☐ Emancipation
☐ Modification
☐ Paternity
☐ Property Division
☐ Separate Maintenance
☐ Termination of Parental Rights
☐ UIFSA (formerly URESA)
☐ Other _____

Contract

- ☐ Breach of Contract
☐ Installment Contract
☐ Insurance
☐ Product Liability under Contract
☐ Specific Performance
☐ Other _____

Probate

- ☐ Accounting (Probate)
☐ Birth Certificate Correction
☐ Commitment
☐ Conservatorship
☐ Guardianship
☐ Heirship
☐ Intestate Estate
☐ Minor's Settlement
☐ Muniment of Title
☐ Name Change
☐ Power of Attorney
☐ Testate Estate
☐ Will Contest
☐ Other _____

Statutes/Rules

- ☐ Bond Validation
☐ Civil Forfeiture
☐ Declaratory Judgment
☐ ERISA
☐ Eminent Domain
☐ Extraordinary Writ
☐ Federal Statutes
☐ Injunction or Restraining Order
☐ Municipal Annexation
☐ Racketeering (RICO)
☐ Railroad
☐ Seaman
☐ Other _____

Appeals

- ☐ Administrative Agency
☐ County Court
☐ Hardship Petition (Driver License)
☐ Justice Court
☐ MS Employment Security Comm'n
☐ Municipal Court
☐ Oil & Gas Board
☐ Workers' Compensation
☐ Other _____

Children and Minors - Non-Domestic

- ☐ Adoption - Noncontested
☐ Consent to Abortion for Minor
☐ Removal of Minority
☐ Other _____

Torts-Personal Injury

- ☐ Bad Faith
☐ Fraud
☐ Loss of Consortium
☐ Malpractice - Legal
☐ Malpractice - Medical
☐ Negligence - General
☐ Negligence - Motor Vehicle
☐ Products Liability
☐ Wrongful Death
☒ Other Defamation

Mass Tort

- ☐ Asbestos
☐ Chemical Spill
☐ Dioxin
☐ Hand/Arm Vibration
☐ Hearing Loss
☐ Radioactive Materials
☐ Other _____

Real Property

- ☐ Adverse Possession
☐ Ejectment
☐ Eminent Domain
☐ Judicial Foreclosure
☐ Lien Assertion
☐ Partition
☐ Receiver Appointment
☐ Tax Sale: Confirmation/Cancellation
☐ Title, Boundary &/or Easement
☐ Other _____

Civil Rights

- ☐ Elections
☐ Habeas Corpus
☐ Post Conviction Relief
☐ Prisoner
☐ Other _____

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF

Docket No. _____
 File Yr _____ Chronological No. _____ Clerk's Local ID _____

Docket No. If Filed
 Prior to 1/1/94 _____

**DEFENDANTS IN REFERENCED CAUSE - Page 1 of ____ Defendants Pages
 IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

Defendant #2:

Individual: Edwards Peter (_____) _____
 Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #3:

Individual: _____
 Last Name First Name (_____) _____
 Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #4:

Individual: _____
 Last Name First Name (_____) _____
 Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

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D/B/A _____

Business _____
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

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D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

FEE BILL, CIVIL CASES, CIRCUIT COURT

State of Mississippi
Hancock County

HANDSHOE, DOUGLAS VS TORSTAR CORPORATION DBA TORONTO STAR NE

Case # 15-0072 Acct # Paid By M/O Rct# 28466

CLERK'S FEES	85.00
JURY TAX	3.00
COURT REPORTERS FEE	10.00
LAW LIBRARY	2.50
COURT ADMINISTRATOR	2.00
STATE CT ED FUND	2.00
COURT CONSTITUENTS	.50
ELECTRONIC COURT	10.00
LEGAL ASSISTANCE	5.00
JUDICIAL FUND-JUDGE RAISE	40.00
ARCHIVE FEE	1.00

=====
Total \$ 161.00

Payment received from DOUGLAS HANDSHOE

Transaction 31439 Received 2/23/2015 at 15:55 Drawer 1 I.D. KENDRA

Current Balance Due \$0.00 Receipt Amount \$ 161.00

By  D.C. Karen Ladner Ruhr, Circuit Clerk

Case # 15-0072 Acct # Paid By M/O Rct# 28466